

1 KEKER & VAN NEST LLP
2 ROBERT A. VAN NEST - # 84065
3 rvannest@kvn.com
4 CHRISTA M. ANDERSON - # 184325
5 canderson@kvn.com
6 DANIEL PURCELL - # 191424
7 dpurcell@kvn.com
8 633 Battery Street
9 San Francisco, CA 94111-1809
10 Telephone: (415) 391-5400
Facsimile: (415) 397-7188

7 KING & SPALDING LLP
8 BRUCE W. BABER (pro hac vice)
bbaber@kslaw.com
1185 Avenue of the Americas
9 New York, NY 10036
Tel: (212) 556-2100
10 Fax: (212) 556-2222

11 Attorneys for Defendant
12 GOOGLE INC.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 ORACLE AMERICA, INC.,
17 Plaintiffs,
18 v.
19 GOOGLE INC.,
20 Defendant.

21 Case No. 3:10-cv-03561 WHA

22 **DECLARATION OF KATE LAZARUS IN
SUPPORT OF GOOGLE INC.'S
ADMINISTRATIVE MOTION TO SEAL
GOOGLE'S RESPONSE TO REQUEST
FOR BRIEFING RE ADMISSIBILITY OF
PRIOR STATEMENTS IN CASE**

23 Dept. Courtroom 8, 19th Fl.
24 Judge: Hon. William Alsup

1 I, Kate Lazarus, declare as follows:

2 I am an associate at the law firm of Keker & Van Nest LLP, counsel to Google Inc.
3 (“Google”) in the present case. In accordance with Local Rule 79-5(d)(1)(A) & (e), I submit this
4 declaration in support of Google’s Administrative Motion to Seal Google’s Response to Request
5 for Briefing re: Admissibility of Prior Statements. I have knowledge of the facts set forth herein,
6 and if called to testify as a witness thereto could do so competently under oath.

7 The following portion of Google’s Response summarize, quote from, or reproduce
8 portions of materials that have been designated by Oracle as “CONFIDENTIAL” or “HIGHLY
9 CONFIDENTIAL – ATTORNEY’S EYES ONLY” under the Stipulated Protective Order in this
10 case:

11 • Page 5, lines 2-5: text after “For example” until end of sentence.

12 I declare under penalty of perjury that the foregoing is true and correct and that this
13 declaration was executed at San Francisco, California on April 25, 2016.

14
15 By:



16 _____
17 KATE E. LAZARUS
18
19
20
21
22
23
24
25
26
27
28